

APRIL 2021



Incentive News

TENNCARE EHR PROVIDER INCENTIVE PAYMENT PROGRAM

A CMS "Promoting Interoperability" Program

Reminders:

Information which will assist you —and the latest updates — is available on the [TennCare EHR Incentive website](#).

Accepting all Program Year 2020 attestations **only until 11:59 P.M. Central Time on March 31, 2021.**

Can We Help?

If you have questions about your upcoming attestation, contact us at [TennCare.EHRIncentive@tn.gov](#), Monday through Friday from 7:00 a.m. to 3:30 p.m. Central Time. When emailing, please include your provider's name(s) and NPI(s).

Wednesday, March 31 Is Final Day to Submit Year 2020 Attestations

The last minute is here! There are now only a few more days of March remaining in which to attest for Program Year (PY) 2020 with the TennCare EHR Provider



Incentive Payment Program (PIPP). Attestations must be completed and submitted no later than 11:59 p.m. Central Time March 31, 2021.

In order to attest for PY 2020, eligible providers (EPs) must have successfully attested to and received payment for Program Year 2016 or earlier. EPs must also be able to meet the requirements for eligibility, patient volume, Meaningful Use, and Clinical Quality Measure (CQM) criteria in order to qualify for an incentive payment. For those who need it, we have a last minute review of 2020 requirements on page 2 of this issue.

After March there is only one final opportunity to attest for a TennCare EHR Incentive, and that is for PY 2021. The submission period for PY 2021 will begin later this year, on July 1, and end September 30.

Program Year 2020

PIPP is open ONLY for a few more days.

Submission deadline: March 31, 2021, 11:59 p.m. CT.

MU and eCQM reporting period in 2020 for EPs in the Medicaid Promoting Interoperability Program is a minimum of any continuous 90-day period within CY 2020.

Program Year 2021

PIPP opens July 1, 2021.

The MU reporting period must end by July 31, 2021.

Submission deadline: Sept. 30, 2021, 11:59 p.m. CT.

MU and eCQM reporting period is a minimum of any continuous 90-day period within CY 2021, provided that the end date for this period falls before July 31, 2021.



Do You Have Questions About

The EHR Incentive Program?

Meaningful Use Measures?

Electronic Clinical Quality Measures?

Your attestation?

Email TennCare.EHRIncentive@tn.gov

Always include the Provider's Name and NPI when communicating with TennCare.

Here's a *Last Minute* Review of Requirements for Program Year 2020 Attestations

Now only a few more days of March 2021 remain in which to submit a Program Year (PY) 2020 attestation to TennCare's EHR Provider Incentive Payment Program (PIPP) for 2020. This is your last minute review of requirements for attesting.

1. Make sure you completed your Security Risk Assessment (SRA) and the 90-day Meaningful Use (MU) period by the end of 2020.

The deadline for submitting Program Year (PY) 2020 attestations will be March 31, 2021, period. No PY 2020 attestations will be accepted after this date. And once you complete this attestation, you'll be able to begin your PY 2021 attestation. That's important because you will be required to submit 2021 attestations between July 1 and Sept. 30, 2021, as the TennCare EHR Provider Incentive Payment Program will then come to its end.

2. All EPs attesting for PY 2020 will be required to attest to MU Stage 3 and demonstrate use of a 2015 edition of certified EHR technology (CEHRT). EPs may use any continuous 90-day period from calendar year 2020 for which MU can be successfully demonstrated.
3. Review details regarding PY

2020 objectives and measures via [this PDF download](#) from CMS, and PY 2020 eQMs are available for review on the [eCQI website](#).

4. Patient Volume will come from a 90-day period in **2019**.
5. MU and eCQM data will come from a 90-day period in **2020**. CMS encourages eCQM data for the full year but will accept 90-days for PY 2020.

Check your attestation carefully, as the correction and resubmission period for returned 2020 attestations will be tighter than in years past. This is because the attestation period for PY 2021 will begin July 1, 2021. You will not be able to attest for PY 2021 until your PY 2020 attestation has been approved or denied, therefore all PY 2020 attestations that are submitted timely by March 31, 2021 must have any requested corrections resolved by June 30, 2021.

If you have any questions, please do not hesitate to immediately contact a member of the EHR Incentive office at TennCare.EHRIncentive@tn.gov. And remember, **ALWAYS include the provider name and NPI** in the body of the message when sending email.

The Last Round-Up: 2021

In 2009, Congress passed the American Re-Investment and Recovery Act (ARRA) of 2009, which included the Health Information Technology for Economic and Clinical Health (HITECH) Act. HITECH would encourage certain health care providers to move from old, outdated paper recordkeeping systems to certified electronic health records (EHR) technology (CEHRT). Eligible Professionals and Eligible Hospitals could begin submitting attestations to the EHR Incentive programs of State Medicaid Agencies (such as TennCare) in 2011, with the opportunity to receive financial incentives for making the change.

Here we are 10 years later and our EHR Provider Incentive Payment Program is coming to an end. Even though enrollment in the program closed with Program Year 2016, we continue to hear from providers who are now adopting CEHRT in their practices.

Per CMS Rules & Regulations, the last incentive payment must go out the door no later than December 31, 2021.

What does this mean to those who want to participate in the EHR Incentive Program one last time?

You are eligible to attest for 2021 if

- ♦ You received at least one (1) EHR Incentive Payment for

Program Year 2016 or earlier; and,

- ♦ You have not yet received all six (6) incentive payments permitted under the Program.

The final attestation period is any consecutive 90-day period in 2021 between January 1 and July 31.

The Patient Volume period is a consecutive 90-day period in 2020.

The Meaningful Use (MU) reporting period is a consecutive 90-day period between January 1 and July 31, 2021.

THE FINAL ATTESTATION SUBMISSION PERIOD BEGINS JULY 1, 2021 AND ENDS 11:59 P.M. CENTRAL ON SEPTEMBER 30, 2021 – NO EXCEPTIONS.

If you use the 90-day MU attestation reporting period of May-June-July, you **must still** submit your attestation by September 30.

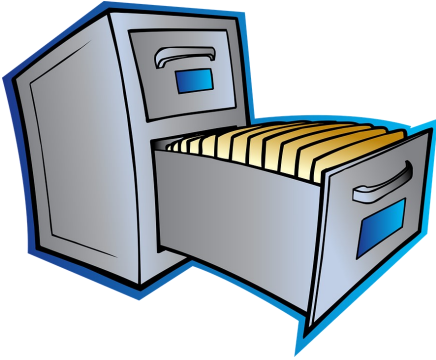
Security Risk Assessment (SRA): You can submit your attestation before your 2021 SRA is complete. However, you must attest that you will conduct your SRA by December 31, 2021 and submit it to TennCare by January 31, 2022. SRAs completed after your attestation has been submitted are to be sent to: InternalAudit.TennCare@tn.gov. Enter "2021 SRA" as the subject.

If we return your 2021 attestation with problems, you **must** correct **and** resubmit your attestation **ASAP!** To meet the CMS-mandated deadline for making payments, we must cut off processing payments by mid-December. Any resubmissions following the **cutoff DATE** will be **DENIED**.

For more about how to attest during this final submission period, please [visit our website](#). If you should experience problems with your attestation, submit **ALL** inquiries to TennCare.EHRIncentive@tn.gov. The box specifically for MU questions has been closed.

To view TennCare's progress with approved attestations and payments over the years, access our [Payment Table](#). This table is updated weekly.

Again, in order for TennCare to meet the CMS-required deadline for payments of December 31, 2021, **you must adhere to the above timelines and deadlines**. We have no "wiggle" room. All attestations, whether first-time submissions or resubmissions following correction, that are received after the cutoff dates **WILL BE DENIED**. We will do everything possible to see that you get the EHR Incentive Payment for which you qualify, but we will need your help to do so.



Save that 2020 Attestation Documentation Now – It's a Requirement!

As you wrap up work on your 2020 EHR Incentive attestation, file your documentation immediately! Don't put it aside, don't leave it on that untouched stack of papers on your desk. Don't stick it in the recycle bin and don't throw it in the trash. Don't do anything that might mean there's a chance you'll never see it again.

Always file any and all previous attestation documentation immediately with your long-term records. In light of the possibility of a post-payment audit, **providers are required to retain documentation in support of all attestations for no fewer than six years after each payment year.**

All incentive payments received by a provider are subject to audit. The provider may be asked to produce documentation to support any of the information in the attestation. If sufficient documentation is not produced, the provider may be determined ineligible for the payment.

What types of documentation should be saved?

The short answer is all of the documentation used in preparing a year's attestation. But here are

specific examples and details recommended by our auditors for some types of documentation you may not think about:

- Save a dashboard report from your certified EHR technology (CEHRT), showing provider name and correct reporting period.
- If you have data from multiple practice locations, add data together and save reports for each location.
- Save documentation showing legal and/or financial proof that you own or are leasing your CEHRT. Include a signed letter from your CEHRT vendor supporting a required upgrade to your base system as needed. If you use one of the "free" CEHRTs, save your complete user agreement and a signed letter from your vendor acknowledging your right to use the technology.
- Save electronic copies of your attested Meaningful Use data, in spreadsheet format if available. This includes the dashboard report and detail reports of each numerator and denominator included in the attestation. The detail reports supporting each numerator and denominator should include sufficient information to identify each patient included in the calculation for the measure.
- If the provider meets an exclusion for a percentage-based measure, save appropriate documentation that supports the exclusion.
- Keep a copy of the Security Risk Analysis (SRA), prepared in a final report format, for the program year. The SRA must be completed after January 1 and prior to the end of the program year.
- Collect all Clinical Decision Support (CDS) and Drug Interaction documentation, which must be dated during the EHR reporting period. Documentation may be dated prior to the EHR period if the EP can demonstrate the functionality was not disabled.
- Save Public Health Measure documentation, which must be dated prior to the end of the reporting period to meet active engagement.

The requirement to retain documentation to support all attestations for a minimum of six years after each payment year is noted on the Signature Page the provider signs for each attestation.

“Why Did I Receive a 1099 for an EHR Incentive Payment Made during 2020?”

The State of Tennessee mailed 1099s to individual Eligible Professionals (EPs) who received EHR Incentive Payments made during 2020. IRS guidelines require the issuance of Form 1099 to the EP, however, EPs will again have the option to assign their EHR Incentive Payment to their Group Practice or Clinic. The mailing was completed by January 31, 2021.

OMB No. 1545-0115	
2020	Miscellaneous Income
Form 1099-MISC	

“What do I need to do with it?”

The 1099 is an informational form that is also provided to the IRS. To determine if payments are taxable, you must consult your tax professional. The EP is responsible for selecting the appropriate option in the CMS Registration and Attestation System, whether the EP is to receive the EHR Incentive Payment or it is to be made to a designated Payee NPI (one with which the EP has a contractual relationship). The payment can be designated to a different entity for each year of program participation, but cannot be divided during a single year of participation.

CMS, the Division of TennCare, and the EHR

Do You Need Account Assistance?

When you email the PIPP Help Desk at TennCare.EHRIncentive@tn.gov with questions about your user account, please give us:

- The provider's name
- The provider's individual NPI
- The group/Payee NPI

If you lock your account by making too many log-in errors, changing your password will not unlock it. We must unlock it for you. If necessary, we can change your password at the same time. If you do not know answers to security questions, we can disassociate the account from the provider. You can then set up a new account with a user name, password, and answers to security questions of your own choosing.

Provider Incentive Payment Program (PIPP) are not responsible for decision-making or mediation regarding the assignment of EHR Incentive Payments.

“Should that 1099 have gone to my group?”

In most cases the EHR Incentive Payment itself is distributed to the group practice. When this occurs, it is the responsibility of the EP to report the payment on Form 1099-MISC to the employer or entity which bills for the EP's services. Contact your employer to obtain the tax ID number to be entered on the Form 1099-MISC.

Again, EPs are strongly encouraged to contact their tax professional on the proper handling of this matter.

“The IRS says I got a 1099 but I never saw it. What now?”

EPs who lose their 1099 or otherwise need a replacement should contact F&A Accounts, Supplier Maintenance at F.A.Accounts@tn.gov. (There is an underscore [_] between the F and the A.) In your message, please provide the tax year for which the 1099 is needed, Tax ID number, name, and an email address, fax number, or current mailing address where the replacement 1099 can be sent.

Questions about the PIPP should be sent to TennCare.EHRIncentive@tn.gov. F&A Accounts, Supplier Maintenance is NOT able to assist you with EHR Program-related questions.



Division of

TennCare**EHR Incentive News****APRIL 2021**

Medicaid EPs and EHs should submit questions about the Medicaid Promoting Interoperability (PI) Program (in Tennessee also known as the TennCare EHR Provider Incentive Payment Program) to TennCare.EHRIncentive@tn.gov; including questions about

- Eligibility (first 4 attestation pages)
- Meaningful Use
- Clinical Quality Measures
- Program Participation

ALWAYS include the provider's name and NPI when contacting us. We will respond to your inquiry as quickly as possible.

Should you have issues with a CMS website, contact the QualityNet help desk for assistance at qnetsupport@hcqis.org or 1-866-288-8912.

View TennCare Medicaid EHR Incentive Program online assistance at

- [Program website](#)
- How-to [PowerPoint Presentations](#)
- [FAQs](#)
- [Acronyms & Glossary](#)
- [Previous issues](#) of EHR Incentive News

TennCare E-Newsletters: If you choose to unsubscribe from this list at any time, you may do so by sending a message to: listserv@listserv.tn.gov, (no subject) and unsubscribe MedicaidHIT. You will receive an email confirming your removal.

Changed Your Practice Location(s) Recently?

Is your primary practice location changing this Spring? Have you found yourself in a strange new place because of changes related to the COVID-19 pandemic? No matter the reason for an address change, make sure TennCare has information on each location where you practice.

Before the 2021 attestation submission period begins, be sure to update your practice location (s) in the following systems:

1. CMS EHR Registration and Attestation website
2. CAQH ProView
3. TennCare Provider Registration Portal
4. NPPES NPI Registry

We stress having the correct, up-to-date, and **EXACT** address for all locations because we now

check the practice addresses listed on your attestation against the addresses in these system profiles. If there is not an **EXACT** match, we return your attestation.

Not sure of your correct address(es)? Check with your local post office or mail carrier, as they can provide your correct address. If your address is a post office box, ask for the physical address.

Unsure what practice locations are on file for you now in CAQH and the TennCare Provider Registration System? You may contact provider.registration@tn.gov for that information.

Don't know how to update your profiles? Obtain our free PDF resource, [How to Update Your Practice Address](#). This simple, easy-to-follow guide will instruct you on making changes in each system.